

**From:** Chang, Lisa  
**Sent time:** 05/16/2016 09:46:11 AM  
**To:** Dietrich Schmitt <dschmitt@nwifc.org>; Norman, Rachel <rnorman@nwifc.org>  
**Subject:** Follow up on grant orientation/discussion  
**Attachments:** Notes from 5/13/16 call RE: Routing QAPP signature pages

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Some topics we can touch on include:

- Follow up from 5/13 call (notes attached)
- Discuss QAPP flow (notes attached)
- Follow up from FEATS comments sent 5/16/16

**From:** Chang, Lisa  
**Sent time:** 05/12/2016 07:23:48 PM  
**To:** Dietrich Schmitt <dschmitt@nwifc.org>  
**Cc:** Norman, Rachel <rnorman@nwifc.org>  
**Subject:** RE: Routing QAPP signature pages

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Hi Dietrich and Rachel,

I apologize for taking so long to respond to Dietrich's question. It actually took me a bit of time to regroup on the QAPP process. Tiffany and I worked extensively with EPA's QA program in 2011 to hammer out a flow/routing scheme for processing QAPPs. It has morphed a little over the years and I wanted to reconstruct that a bit.

It would probably be a good idea for us to have a short phone conversation to go over this (perhaps this is something that Rachel and I should go over and bring Dietrich in only if needed). I think that in practice, this is how the overall flow has worked in recent times and can work going forward if all are agreeable:

- 1) Tribe submits draft QAPP or QAPP addendum to NWIFC Puget Sound Recovery Projects Coordinator (Rachel)
- 2) Rachel forwards the Tribe's draft QAPP or QAPP addendum to EPA Project Officer (Lisa)
- 3) Lisa forwards draft QAPP or QAPP addendum to EPA Region 10 QA support team (via an EPA-internal group e-mail) where it is queued for review
- 4) EPA R10 QA support team assigns it in turn and reviews
- 5) EPA R10 QA support team sends comment memo and/or approval memo to Lisa, cc-ing Rachel and/or Tribe as well (this varies, depending on reviewer; sometimes it is sent directly to Tribal staff with a cc to Lisa and Rachel; sometimes it is sent to Rachel with a cc to Lisa). If it is sent to Lisa and Rachel, Rachel should respond that she will pass the memo to the Tribe. If it is sent just to Lisa, Lisa forwards it to Rachel for passing it along to the Tribe. If it is sent to the Tribe directly, with a cc to Lisa and Rachel, the Tribe can go ahead and begin responding. The EPA R10 QA staff always cc Lisa on any communication with the Tribe or NWIFC as Lisa is the Project Officer.
- 6) The tribe can proceed with their work once they have an approval memo.
- 7) After addressing all comments and receiving an EPA approval memo (if they haven't already), the Tribe submits the final revised QAPP and QAPP signature page, signed by Tribal representatives, to Rachel
- 8) Rachel signs for NWIFC and sends revised QAPP and QAPP signature page to Lisa
- 9) Lisa signs and delivers to QA team, who sign and return to Lisa (I tend to accumulate/batch QAPP signature pages).
- 10) Lisa PDFs fully signed page; and sends to Rachel. Lisa archives electronic PDFs of fully signed pages on EPA server.
- 11) Rachel sends fully signed PDF to Tribe.

Tiffany maintained a detailed control sheet and would track where QAPPs were within this process, and would let me know if any QAPPs needed to be followed up on. Tiffany did a "QAPP Round Up" about a year ago (March 27 2015) in which we rounded up all outstanding signature pages and got them to their respective Tribes, and did a status check on QAPPs that were in the process of review.

Also, in June 2015, Tiffany and I had some exchange about how many more QAPPs we anticipated would have to be processed under the Tribal LO award. What we estimated at that time was that for the rest of the Tribal LO award, we might have 4-7 new QAPPs and 25-30 QAPP addendums. Since that was a year ago, we probably are down to somewhere more like 3-5 new QAPPs and 10-15 QAPP addendums left.

That's all for now. I do have a batch of QAPP signature pages ready to send to you; I am waiting on a few of them from the QAPP program and will send them all your way hopefully in the next few days.

Sorry for such a long message. Let's find a time to talk, perhaps late next week.

Lisa

Lisa H. Chang, Ph.D. | **Puget Sound Team**  
U.S. Environmental Protection Agency, Region 10  
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**From:** Dietrich Schmitt [mailto:dschmitt@nwifc.org]  
**Sent:** Monday, March 14, 2016 10:18 AM  
**To:** Chang, Lisa  
**Subject:** Routing QAPP signature pages

Hi Lisa,

I just wanted to ensure I understand the QAPP signature routing process. Once the QAPP is approved does process start by the Tribe signing the page, then NWIFC and then EPA? Also has the EPA required the original hard copy or will electronic copies suffice?

Thanks,

Dietrich

Dietrich Schmitt

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**From:** Chang, Lisa  
**Sent time:** 05/13/2016 01:23:06 PM  
**To:** Norman, Rachel <rnorman@nwifc.org>; Dietrich Schmitt <dschmitt@nwifc.org>  
**Cc:** Chang, Lisa  
**Subject:** Notes from 5/13/16 call

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Follow up items in yellow highlight.

- Talk about how T&C flow down to subawardees – Lisa find material used with all LOs
- Lisa – request change of PM to Rachel on award document
- Kathy Tsing-Choy is new GS – Lisa confirm?
- Cost principles, audit requirements – Dietrich working with Rachel on how these apply to review of subawards. Rachel will be going to omni-circular training. Dietrich has a lot of dialogue with accounting firms that do this work; they provide webinars, annual training in DC. NWIFC directs a lot of resources into grants training. NWIFC sometimes gets something from Moss-Adams, sometimes they host webinars on omni-circulars.
- Audit requirements – NWIFC reviews each subawardee's audit reports. If there are audit findings, must ensure corrective findings are in place. Passes on whole cloth to subawardees. Over last few years, maybe 3-4 circumstances. Davis-Bacon, suspension/disbarment. For their vendors, required to go to SAM, must ensure those vendors not suspended or disbarred. Tribe has not had appropriate policies and procedures in place to ensure compliance, could lead to questioned cost; then those vendors are subjected to a test, could lead to disallowed cost. But did not lead to disallowed cost. Corrective action plan would include how this would not happen again. NWIFC would issue a management decision letter either concurring, changes in internal record keeping (e.g., in case of disallowed cost).
- Paula's point - T&C 16 – Subaward Reporting and Executive Compensation – item c1 – is this occurring under capacity awards? LISA CHECK IN WITH YVETTE ON THIS
- LISA – FIND OUT WHEN THE LO COORDINATING CALLS WILL BE HAPPENING, HOW, ETC.
- LISA – RE-SEND NEW EPA SUBAWARD MONITORING POLICY.
- PROGRAMMATIC T&C 1 – ELECTRONIC AND INFORMATION TECHNOLOGY ACCESSIBILITY – DOES THIS APPLY TO WHATSUPSTREAM? LISA RESEARCH.
- HOW FEM COMPETENCY FLOWS THROUGH TO SUBAWARDEES – WE SHOULD TALK ABOUT THIS.
- “Review and approve technical deliverables” T&C 10 – does EPA review and approve final deliverables, does that mean we disapprove the work that led up to the deliverable and imply disallowed costs? What is EPA role? Needs some discussion and work going forward, could use clarification.
- STORET: 11 and 13 are redundant, was this corrected? NWIFC has its own data exchange, which uploads readily uploadable information into STORET; rest is in NWIFC data exchanges.
- QA – will schedule a separate call to follow up on Lisa's 5/12/16 e-mail.
- Also technical review T&C – not in this award, should be added. Need to talk more about what constitutes technical review.
- Table talking about RB T&C.